

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

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AMPEX CORPORATION,

*Plaintiff,*

v.

EASTMAN KODAK COMPANY,  
ALTEK CORPORATION, and CHINON  
INDUSTRIES, INC.,

*Defendants.*

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C.A. No. 04-1373 (KAJ)

**STIPULATION AND ORDER TO EXTEND DISCOVERY**

IT IS HEREBY STIPULATED by the parties, subject to the approval of the Court, that the Scheduling Order dated October 17, 2005 shall be amended as follows:

1. Fact Discovery: The parties are authorized with respect to the following depositions that have been or are to be taken after February 28, 2006, the fact discovery cut off date:

<b>Deposition</b>	<b>Date/Time</b>
30(b)(6) of Kodak re: certain topics from notice dated 1/31/06 (Westbrook)	3/6/06; 9:30 a.m.
Fabian	3/7/06; 9:30 p.m.
Holbrook	3/10/06; 9:30 a.m.
30(b)(6) of Ampex, re: certain topics from notice dated 12/1/05 (Felix)	3/8/06; 9:30 a.m.
MacLeod	3/10/06; 9:30 a.m.
Beaulier	3/30/06; 9:30 a.m.; to be limited to questions as ordered by the Court at March 14, 2006 discovery conference.
Scott and 30(b)(6) of Kodak re: Topics 1, 4, 12 and 13 as they relate to Ofoto/EasyShare Gallery from notice dated 1/31/06	3/16/06; 9:00 a.m.

Deposition	Date/Time
Previously served document and testimonial subpoenas of non-parties	Permitted to be scheduled during March

2. Expert Discovery: To accommodate the above discovery extension, and the schedules of counsel and witnesses, the schedule for expert discovery is extended as follows:

	Current date	New Date
Expert Reports due date (Scheduling Order ¶ 3d)	3/14/06	3/24/06
Rebuttal Reports due date (Scheduling Order ¶ 3d)	4/7/06	4/7/06, except that the rebuttal reports of Ligler and Storer shall be due 4/24/06
Expert Discovery Ends (Scheduling Order ¶ 3d)	4/28/06	5/10/06, provided that the depositions of Ligler, Storer, Meyer and Preuss shall take place after 4/24/06
Summary Judgment Motions (Scheduling Order ¶ 9)	5/12/06	5/17/06
Claim Issues Submitted (Scheduling Order ¶ 11)	5/12/06	5/17/06

3. Case Dispositive Motions: The parties agree to the following briefing schedule for case dispositive motions:

Opening Summary Judgment Briefs	5/17/06
Parties exchange Opening Claim Construction Briefs	5/17/06
Summary Judgment Opposition Briefs	5/31/06
Parties exchange Responsive Claim Construction Briefs	6/2/06
Summary Judgment Reply Briefs	6/9/06

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

PRICKETT, JONES & ELLIOTT

*/s/ Julia Heaney*

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*Attorneys for Defendants*

SO ORDERED

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U.S. District Court Judge